

FILED

MAR 13 2024

BONNIE HACKLER
Clerk, U.S. District Court

By _____
Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

CR 24 - 029 RAW

SALVADOR MADRIGAL-SANCHEZ,
a/k/a Salvador Madrigal Sanchez,
a/k/a Jose Martinez Sanchez
a/k/a Jose Sanchez Martinez,

Defendant.

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

UNLAWFUL REENTRY OF REMOVED ALIEN
[8 U.S.C. §§ 1326(a) & 1326(b)(2)]

On or about October 3, 2023, at or near Holdenville, in the Eastern District of Oklahoma, the defendant, **SALVADOR MADRIGAL-SANCHEZ a/k/a Salvador Madrigal Sanchez a/k/a Jose Martinez Sanchez a/k/a Jose Sanchez Martinez**, an alien, was found in the United States after having been previously denied admission, excluded, deported, and removed from the United States at or near:

- Eagle Pass, Texas on or about August 19, 2004,
- Del Rio, Texas on or about January 5, 2010,
- Laredo, Texas on or about November 3, 2017, and
- Laredo, Texas on or about March 25, 2022,

and not having obtained the express consent of the Secretary of Homeland Security to reapply for admission to the United States, in violation of Title 8, United States Code, Section 1326(a) and (b)(2).

COUNT TWO

**FELON IN POSSESSION OF A FIREARM
[18 U.S.C. §§ 922(g)(1) and 924(a)(8)]**

On or about October 3, 2023, in the Eastern District of Oklahoma, the defendant, **SALVADOR MADRIGAL-SANCHEZ a/k/a Salvador Madrigal Sanchez a/k/a Jose Martinez Sanchez a/k/a Jose Sanchez Martinez**, having been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing of such conviction, did knowingly possess in and affecting commerce, a firearm, to-wit:

- Savage Model: 62, Caliber: 22LR, Type: Rifle, Serial Number 3766765;
- Wilson Combat Model: not listed, Caliber: Multi (Chambered in 5.56 NATO), Type: Rifle, Serial Number: WCPL09524;
- Henry Repeating Arms Model: Silver Eagle, Caliber: 22 S/L/LR, Type: Rifle, Serial Number: SE001339; and
- Remington Model: 7400, Caliber 270Win, Type: Rifle, Serial Number: 8637569,

which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT THREE

**POSSESSION OF A FIREARM BY AN ILLEGAL ALIEN
[18 U.S.C. §§ 922(g)(5) and 924(a)(8)]**

On or about October 3, 2023, in the Eastern District of Oklahoma, the defendant, **SALVADOR MADRIGAL-SANCHEZ a/k/a Salvador Madrigal Sanchez a/k/a Jose Martinez Sanchez a/k/a Jose Sanchez Martinez**, knowing he was an alien illegally and

unlawfully present in the United States, did knowingly possess in and affecting commerce, a firearm, to-wit:

- Savage Model: 62, Caliber: 22LR, Type: Rifle, Serial Number 3766765;
- Wilson Combat Model: not listed, Caliber: Multi (Chambered in 5.56 NATO), Type: Rifle, Serial Number: WCPL09524;
- Henry Repeating Arms Model: Silver Eagle, Caliber: 22 S/L/LR, Type: Rifle, Serial Number: SE001339; and
- Remington Model: 7400, Caliber 270Win, Type: Rifle, Serial Number: 8637569,

which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(5) and 924(a)(8).

FORFEITURE ALLEGATION
[18 U.S.C. § 924(d) & 28 U.S.C. § 2461(c)]

The allegations contained in Counts Two and Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).


Upon conviction of the violations charged in Counts Two and Three of this Indictment involving violations of Title 18, United States Code, Sections 922(g)(1), 922(g)(5), and 924(a)(8), the defendant, **SALVADOR MADRIGAL-SANCHEZ a/k/a Salvador Madrigal Sanchez a/k/a Jose Martinez Sanchez a/k/a Jose Sanchez Martinez**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offenses, including, but not limited to:

- Savage Model: 62, Caliber: 22LR, Type: Rifle, Serial Number 3766765;
- Wilson Combat Model: not listed, Caliber: Multi (Chambered in 5.56 NATO), Type: Rifle, Serial Number: WCPL09524;

- Henry Repeating Arms Model: Silver Eagle, Caliber: 22 S/L/LR, Type: Rifle, Serial Number: SE001339; and
- Remington Model: 7400, Caliber 270Win, Type: Rifle, Serial Number: 8637569.

A TRUE BILL:

CHRISTOPHER J. WILSON
United States Attorney



PATRICK M. FLANIGAN, FL BAR #47703
Assistant United States Attorney

PA 314423

for PATRICK FLANIGAN

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

s / Foreperson

FOREPERSON OF THE GRAND JURY